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October 18, 2018

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al
16-cr-0371-4 (RA)

Dear Judge Abrams:

I write on behalf of my client Bevan Cooney requesting that his appearance be waived at the oral argument on post-trial motions on October 23, 2018 in the above-captioned matter. This Court previously endorsed Mr. Cooney's waiver of his right to be present in open court for any conference or hearing in this case, before or after trial. (Dkt. 82). As the Court may recall, Mr. Cooney resides out-of-state and is facing significant financial challenges. Waiving Mr. Cooney's appearance at the October 23, 2018 hearing, pursuant to the terms of the endorsed waiver, will enable Mr. Cooney to avoid the substantial expenses associated with travel to and from Court.

Based on the foregoing, counsel for Mr. Cooney respectfully requests that the Court confirm that his attendance is excused from the October 23, 2018, hearing in this matter. Of course, I will fully brief Mr. Cooney on the results of the hearing and continue to keep him informed of all that transpires in Court.

Respectfully submitted,

/S/

Paula J. Notari
Attorney for Bevan Cooney

cc: All parties by ECF